

**NELIGAN LLP**

PATRICK J. NELIGAN, JR.  
State Bar No. 14866000  
DOUGLAS J. BUNCHE  
State Bar No. 03342700  
JOHN D. GAITHER  
State Bar No. 24055516  
325 North St. Paul, Suite 3600  
Dallas, Texas 75201  
Telephone: 214-840-5333  
Facsimile: 214-840-5301  
pneligan@neliganlaw.com  
dbuncher@neliganlaw.com  
jgaither@neliganlaw.com  
*Counsel for Debtors and  
Debtors-in-Possession*

**GARMAN TURNER GORDON LLP**

GREGORY E. GARMAN  
Nevada Bar No. 6654, admitted *pro hac vice*  
Email: ggarman@gtg.legal  
WILLIAM M. NOALL  
Nevada Bar No. 3549, admitted *pro hac vice*  
Email: wnoall@gtg.legal  
DYLAN CICILIANO  
Nevada Bar No. 12348, admitted *pro hac vice*  
E-mail: dciciliano@gtg.legal  
7251 Amigo Street, Suite 210  
Las Vegas, Nevada 89119  
Telephone: 725-777-3000  
Facsimile: 725-777-3112  
*Counsel for Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:**

**NATIONAL RIFLE ASSOCIATION OF  
AMERICA and SEA GIRT LLC,**

**DEBTORS<sup>1</sup>**

§  
§  
§  
§  
§  
§  
§

**CHAPTER 11**

**CASE NO. 21-30085-hdh11**

**Jointly Administered**

**DEBTORS' OBJECTIONS TO ATTORNEY GENERAL OF THE STATE OF  
NEW YORK'S DESIGNATIONS OF DEPOSITIONS & PRIOR TESTIMONY AND  
DESIGNATIONS THERETO**

The National Rifle Association of America ("NRA") and Sea Girt LLC ("Sea Girt" and together with NRA, the "**Debtors**"), debtors and debtors-in-possession, by and through their counsel, submit the following Objections and Counter-Designations to the Attorney General of the State of New York's ("NYAG") Designations of Depositions & Prior Testimony.

---

<sup>1</sup> The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt).

### **GENERAL OBJECTIONS**

The Debtors object to the designations of any portion of the transcripts of Anthony Makris, William Winkler, or Melanie Montgomery for those reasons asserted in the *Debtors' Objections to Deposition Testimony from Prior Unrelated Cases and for Which Witnesses are Not Unavailable and Request to Exclude the Same* [ECF No. 494] ("Motion to Exclude") which arguments are incorporated herein as if fully set forth herein. The objections and counter-designations are therefore applicable only to the extent that the Motion to Exclude is overruled or the objections stated herein are otherwise overruled.

The Debtors further reserve their right to raise objections to testimony as it is read into the record or played live at the hearing in this matter.

Furthermore, the designations included testimony that may be cited as confidential and therefore, upon the Court's ruling on objections and testimony being submitted for the record, certain information may need to be sealed as appropriate.

Finally, the designating party has not indicated an intent to introduce any exhibits through these designations and Debtors reserves their rights to object if, and when, the designating party moves for the admission of any exhibits into evidence.

Debtors reserve the right to amend or supplement these objections and counter-designations.

### **SPECIFIC OBJECTIONS**

*Wayne LaPierre, 341 Meeting of Creditors, February 22, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
11:23-12:10		
165:20-166:5		

*David Warren, 341 Meeting of Creditors, February 22, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
16:1-22		
27:3-19		
129: 12-19		128:16-129:11

*Wayne LaPierre, 341 Meeting of Creditors, March 5, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
7:13-8:16		
47:5-49:4		
57:21-58:4	Vague and ambiguous; compound; calls for speculation; calls for a legal conclusion	

*David Warren, 341 Meeting of Creditors, March 5, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
14:6-19		14:20-23
15:24-16:6	Calls for speculation	
49:5-50:9		
79:10-80:8		

*John Frazer, 341 Meeting of Creditors, March 5, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
42:2-20		
47:5-48:13	Testimony of Wayne Lapierre; duplicative of designation referenced in earlier section above	

*Sonya Rowling, 341 Meeting of Creditors, March 5, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
55:20-56:7		

*Deposition of John Frazer, 30(b)(6), taken on March 15, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
11:22-12:1-8, 13-17		
13:19-14:4		
14:16-15:25		
19:4-20:12		
21:17-20	Misstates testimony	
22:17-20	Counsel's question is not evidence	
24:15-20	Counsel's question is not evidence	
25:1-9	30(b)(6) scope	
28:16-29:14		
30:10-16		
33:11-34:23	Form; foundation; assumes facts not in evidence; argumentative; calls for speculation	
36:6-16		
45:2-46:18	Assumes facts not in evidence	
47:15-25		
48:2-18	Form; foundation; argumentative	
49:2-6		
51:4-11	Form; unclear question; vague; ambiguous; assumes facts not in evidence	

Page: Lines	Objections	Counter-designations
53:3-18	Assumes facts not in evidence; argumentative; misstates testimony	
54:3-18	Assumes facts not in evidence; argumentative	
55:13-56:21		
58:6-59:16		
64:17-65:13	30(b)(6) scope	
74:12-75:10	Assumes facts not evidence	
78:7-79:6	30(b)(6) scope	
80:2-23		
88:5-21		
88:25-90:15	Form	
90:25-91:3		
95:5-13		
96:16-21		
99:13-100:6	Calls for a legal conclusion	
120:10-121:8		
124:17-125:22		
130:21-131:1	30(b)(6) scope	
143:24-145:1	30(b)(6) scope	
163:2-164:4		
166:5-167:25		
170:25-171:17	Form	

Page: Lines	Objections	Counter-designations
175:6-19	Counsel's question is not evidence	
185:21-186:24	Hearsay	
188:11-24	Assumes facts not in evidence	
189:20-190:1	Form; misstates testimony	
190:16-21	Question calls for speculation and characterization of events that occurred; incomplete hypothetical; argumentative	
194:21-195:3	Form; 30(b)(6) scope; assumes facts not in evidence	
195:23-196:8	Hearsay	187:21-188:10
197:25-198:11		190:6-9
201:9-23	Question derived from inadmissible hearsay	
203:11-205:18	Hearsay	
207:5-19		
208:15-19		
212:5-24		
213:6-15	30(b)(c) scope; form; compound	
220:13-222:10	Vague; form	
225:9-15	Improper questioning based on documents not in front of the witness	
226:9-227:4		
228:14-230:2		
230:10-231:9		
231:15-233:1	30(b)(6) scope	

Page: Lines	Objections	Counter-designations
240:24-241:7	Document speaks for itself	
303:22-304:3		
304:23-305:14		
312:8-10		
322:7-24	Speculation; relevance	

*Deposition of John Frazer, individually, March 18, 2021*

Page: Lines	Objections	Counter-designations
11:6-9		
11:22-12:3		
17:21-18:1		
18:7-18		
18:22-19-10		
20:8-13		
21:2-6		
21:21-22:4		
26:19=27:9		
28:1-6		
31:5-9		
31:25-32:18		
35:11-16		
37:10-19	Hearsay (37:16-19)	
39:24-40:22	Misstates prior testimony; Document speaks for itself; Hearsay	

Page: Lines	Objections	Counter-designations
41:7-9		
42:8-16		
46:23-47:3		
48:11-25	Ambiguous; Compound	
50:15-51:4		
51:11-16		
52:2-7		
52:10-18		
54:15-55:14		
56:19-57:2		
59:5-24	Ambiguous	
60:2-10	Relevance; Ambiguous	
61:6-11	Relevance	
63:5-13		
63:21-64:7		
65:5-21		
66:8-18		
68:9-19		
71:3-20		
72:4-9		
72:21-25		
73:12-74:3	Seeks a legal conclusion	
74:19-20		



Page: Lines	Objections	Counter-designations
74:24-25		
75:1-6		
77:22-78:13		
82:17-19		
82:25-83:1		
83:4-23		
84:24-86:12	Ambiguous (84:24-25); = Ambiguous (85:1-19)	
88:13-92:2	Ambiguous and calls for speculation (88:13-25); Ambiguous, misleading, and compound (89:1-25); Misleading, misstates prior testimony, ambiguous (90:1-25);	
93:1-12		
93:23-94:3		
94:11-16		
95: 3-13	Attorney-client privilege; Ambiguous	
95:15-25	Relevance; Misleading	
97:13-24	Relevance; Lacks foundation; Calls for speculation	
98:16-21	Relevance ; Lacks foundation; Calls for speculation	
99:18-100:3	Relevance; Lacks foundation; Calls for speculation	
101:21-102:2		

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
102:11-13	Lacks foundation; Calls for speculation	
102:24-25		
103:14-20		
104:8-25	Relevance; Lacks Foundation; Calls for speculation; Ambiguous	
105:13-17	Relevance; Lacks Foundation; Calls for speculation	
107:2	Answer to objected question	
108:25-110:7		
111:13-112:10		
112:25-113:1		
113:24-114:21	Ambiguous; Misleading; Lacks Foundation; Document speaks for itself; Best evidence.	
117:7-118:2	Misleading; Misstates prior testimony	
118:15-22	Compound; Misleading	
119:14-120:3		
120:10-122:2	Lacks Foundation; Ambiguous	
125:10-126:9		
128:9-130:1	Ambiguous; Lacks Foundation; Hypothetical	
133:22-134:1		
135:17-136:17		
140:23-141:8	Relevance; Ambiguous; Lacks Foundation	
141:14-143:19	Relevance; Ambiguous; Misstates prior testimony	

Page: Lines	Objections	Counter-designations
149:16-25		
153:17-154:2		
154:11-15		
155:24-156:12	Relevance; Lacks Foundation; Calls for speculation	
156:21-157:2		
158-170	Improper designation – attorney colloquy is not evidence	
171:3-172:21		
173:21-174:16		
175:12-23		
177:3-17		
179:4-10		
184:3-185:23		
186:8-187:22		
188:12-23		
192:11-17		
193:1-17	Misleading; Calls for a legal conclusion; Improper opinion	
194:17-23	Calls for a legal conclusion; Improper opinion; Calls for speculation; Hypothetical	
195:1-12	Calls for a legal conclusion; Improper opinion; Calls for speculation; Hypothetical	

Page: Lines	Objections	Counter-designations
195:17-197:13	Calls for a legal conclusion; Improper opinion; Misleading	
197:23-198:23	Ambiguous; Calls for speculation	
199:5-22	Calls for a legal conclusion; Improper opinion; Calls for speculation	
200:20-201:13		
204:8-13		
204:23-25		
207:23-208:14		
209:21-210:13		
210:21-212:9		
213:21-214:10	Ambiguous; Misleading	
214:14-215:22	Ambiguous; Misleading	
216:20-218:2	Compound; Ambiguous; Misleading;	
218:7-19		
220:4-19		
223:6-12		
224:17-225:6		
226:5-6		
227:11-228:5	Calls for legal advice; Improper opinion	
229:6-12		
237:16-22	Ambiguous; Document speaks for itself	
239:5-17		
240:8-21		

Page: Lines	Objections	Counter-designations
246:2-6	Calls for legal advice; Improper opinion; Calls for speculation; hypothetical	
258:14-21		
260:20-25	Ambiguous; Misleading	
263:5-20	Lacks Foundation; speculation	
267:25-268:5	Relevance; Ambiguous; Misleading	
276:12-277:2	Ambiguous; Misleading	
283:18-284:18	Ambiguous; Misleading	
289:2-21	Ambiguous; Misleading; Compound	
290:14-21	Misstates prior testimony; Ambiguous; Misleading	
291:12-21	Calls for legal conclusion; Improper opinion	
292:1-8	Misleading; Hypothetical	
294:13-21	Misleading; Ambiguous	
295:6-11		
296:14-24	Document speaks for itself	
301:7-23		
302:12-303:4		

*Deposition of Wilson Phillips, Jr, taken on March 19, 2021*

Page: Lines	Objections	Counter-designations
16:21-18:12		
18:20-20:12		

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
21:4-24:23	Vague and ambiguous (21:10 – 22:8); Improper Opinion, Foundation	20:13-21:3
27:11-28:24	Incomplete, ambiguous	27:4-10-28, 25-29:7
29:10-30:5	Ambiguous	
33:23-35:14		
35:24-36:1	Relevance; Speculation	36:2-4
37:19-37:22		
38:10-40:8		
46:1-47:1	Calls for speculation	
52:17-55:5		
55:19-58:6	Calls for speculation (57:18-58:1)	
58:15-62:13	Misstates testimony (59:11-22); Document speaks for itself (60:3-5); Foundation and speculation (60:23-25, 61:5-14)	
63:6-64:10		
66:1-67:16		
68:10-76:11	Foundation and speculation (73:25 – 76:11)	
76:23-77:14		
78:8-81:14	Foundation and speculation	81:5-82:10
82:11-90:3		
90:16-91:3		
92:16-93:24	Foundation and speculation	
92:20-24	Improper opinion testimony	
96:15-96:25	Foundation and speculation	

Page: Lines	Objections	Counter-designations
97:7-98:9		98:16-18
98:19-98:22		98:23-24
100:11-104:6	Foundation and speculation	
108:17-111:2	Foundation and speculation	
111:23-113:13	Foundation and speculation	
115:7-116:9		
117:15-121:19	Foundation and speculation	
117:15-121:19		
121:21-123:1		123:2-123:16
124:12-125:17	Foundation, speculation, assumes facts not in evidence (125:10-14)	
126:9-127.3	Foundation and speculation (126:9-20)	
129:9-147:13	Foundation and speculation (129:18-132:19; 133:11-134:3; 134:16-135:23; 136:18; 139:19-140:9; 146:4-20); Assumes facts not in evidence (140:10-11; 140:21-22; 141:7-9; 142-7-8); Document speaks for itself, calls for a legal conclusion (143:13-146:3); Misstates testimony and hearsay (146:21-147:13)	
148:23-150:2	Foundation	
152:12-153:11	Foundation (152:12-153:6)	
157:20-159:2	Foundation and speculation	
160:10-163:17	Foundation and speculation (161:17-21; 162:2-16; 163:6-10)	
164:17-174:14	Vague (164:17-165:14); Foundation (165:22-166:7; 173:23-25); Speculation (170:22-171:17); Document speaks for itself	

Page: Lines	Objections	Counter-designations
178:4-181:19	Foundation (178:4-179:2); Foundation and speculation (180:25-181:6)	
182:5-17	Foundation and speculation	
186:11-187:9	Foundation and speculation	
191:7-192:19	Foundation and speculation	192:20 – 193:13
193:14-194:5		
204:14-212:13	Foundation: document speaks for itself; Assumes facts not in evidence (206:8)	
212:19-20		
213:4-215:16	Calls for a legal conclusion (215:5-13)	
216:14 – 218:22	Foundation and speculation (216:19-21); Relevance and improper opinion (218:14-17)	
221:7-222:19	Vague; Speculation	
228:6-228:25		
237:10-15	Hearsay	

*Deposition of Sonya Rowling, 30(b)(6), taken on March 19, 2021*

Page: Lines	Objections	Counter-designations
16:10-18:19		16:5-10
21:13-19	Foundation	20:16-21:12
24:4-18		23:20-24:3
24:25-27:6	Foundation	
28:9-30:23	Foundation; Misstates testimony	
33:12-34:12		34:13-35:2
35:3-15		35:16-36:11



Page: Lines	Objections	Counter-designations
37:15-38:17		38:18-20
50:8-14	Speculation	50:15-22
52:5-12		52:13-18
53:20-55:14		55:15-56:3
56:4-11	Foundation; Speculation	
62:13-19		61:25-62:12
66:23-67:2		
71:14-72:10		72:11-17
73:25-74:8		
74:17-75:7		
85:24-86:15		
86:19-87:5		87:6-20
90:1-6		90:7-91:2
91:3-92:15		92:16-17
93:15-18	Foundation	93:19-23
96:16-24		
105:23-106:3		106:4-20
106:21-25		
107:14-108:5		107:1-13
108:20-109:3		108:6-19
110:23-111:8		
113:13-114:15		112:25-113:12
116:9-12		116:13-117:3

Page: Lines	Objections	Counter-designations
117:4-14		
119:17-120:12		118:14-23
132:13-133:7		
133:23-134:5		134:6-16
135:23-137:1		135:13-22 137:2-138:6
138:7-139:22		139:23-140:18
141:17-142:1		142:2-4
142:18-143:14		143:23-144:7
146:19-147:3		147:4-148:8
148:9-149:2		
154:16-155:4		155:5-13
156:14-157:16		157:25-159:20
159:21-161:14		
163:3-164:1		
164:6-167:7	Foundation; Speculation	
170:25-172:2	Speculation	
174:11-175:20		175:21-176:1
180:3-21		
181:3-14		181:15-182:3
182:6-18		182:19-183:13
183:14-20		
184:3-185:13		185:14-186:18

Page: Lines	Objections	Counter-designations
194:22-195:8		195:9-12
196:1-13	Foundation	
203:16-204:15		204:16-21
204:22-205:5		205:6-206:16
217:2-218:6		218:7-12
219:9-15		

*Deposition of Wayne LaPierre, individually and 30(b)(6), taken March 22-23, 2021*

Page: Lines	Objections	Counter-designations
31:22-32:12		
42:6-18		
45:1-9		45:10-24
53:1-15	Incomplete designation; calls for speculation	53:16-54:2
61:2-25	Vague; misstates testimony	
62:14:64-8	Calls for a legal conclusion	
66-17-23		
68:22-69:24	Vague	
73:3-81:19	Improper opinion testimony (73:14-17; 77:9-12); Foundation (75:10-75:18; 79:19-21) and speculation	
84:1-19		
86:15-22		
89:19-90:10	Lack of foundation; calls for speculation	
90:23-99:2	Document speaks for itself (91:10-93:6)	
103:14-105:2		105:7-8

Page: Lines	Objections	Counter-designations
105:10–106:7		106:8-13
106:14–20		
113:6–118:5	Foundation, speculation (114:24-115:11)	118:6-25
120:10–121:11		
124:19–129:9	Argumentative, assumes facts not in evidence, calls for a legal conclusion	
124:23–129:9	<i>(duplicative of preceding cite, same objections)</i>	
129:23–132:4	Incomplete designation, foundation, speculation	
133:4–19		133:20-134:16
134:17–135:4	Argumentative (134:17)	135:5 – 136:15
136:16–138:14	Foundation; calls for speculation	
140:5–25		
143:1–25		
144:25–145:7		
146:4–148:22	Misstates testimony (147:7-13)	
149:2–22	Assumes facts not in evidence	
150:8–152:15	Assumes facts, foundation and speculation (150:24-151:15), vague and ambiguous	
154:1–158:19	Foundation, calls for speculation	
163:12:166:11	Foundation (163:13-21)	
168:12: 170:1		170:2-9
174:23–175:4		
176:6–176:25		177:13-178:16
178:17–23	Assumes facts not in evidence	179:2-181:8

Page: Lines	Objections	Counter-designations
181:10–182: 5		
183:17–184:16	Misstates testimony	
185:13–22	Foundation	
186:12–188:3	Foundations, calls for a legal conclusion	
192:14–193:6		
198:10–15		198:16
200:13–21		200:22-201:4
201:19–202:13		202:18-204:9
204:10–205:2		
209:13–22		209:23-210:10
212:17–230:22	Calls for a legal conclusion (215:21-23, 216:4-7); Speculation (233:13-234:13, 236:9-237:11); Misstates testimony (263:10-13); Other objections as noted in record	
232:1–240:11		
254:23–255:17		
255:22–257:20		
258:11–263:23	Vague (261:18-20)	
265:11–266:14	Speculation (266:5-8)	
266:2–17	<i>This is duplicative of the prior cite and appears to be incomplete</i>	
268:11–272:6	Foundation, calls for a legal conclusion (271:3-272:6)	
272:15–273:12	Calls for a legal conclusion	
283:9–291:17	Speculation (288:6-13)	
299:4–21		

*Deposition of Craig Spray, taken March 24, 2021*

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
17:10-20:11		
21:1-16		21:17-20
22:14-23:2		23:3-24:8
26:14-29:2		29:3-30:20 223:5-224:12 224:23-226:19
30:21-34:20		34:21-35:22
35:23-36:23		
39:1-25		
40:8-43:20		
44:10-47:22		47:23-49:2 241:1-23
49: 3-50:16		
51:2-55:18		55:19-56:19
56:20-57:7		
58:8-14		59:15-60:3
60:8-62:6		
63:24-64:17	Hearsay	64:18-24
68:20-72:18		65:9-66:9 220:7-221:20 270:6-271:12
76:11-76:25		77:1-79:7

Page: Lines	Objections	Counter-designations
80:1-86:1		86:2-6
86:7-90:22		243:14-245:6 246:13-247:5 248:11-249:22 250:22-251:6 257:19-258:22 260:14-261:24
91:4-93:16		93:17-94:1
95:6-96:3		97:3-22
104:13-105:23		98:2-101:15 105:24-106:7 107:7-111:18 121:19-122:25 233:10-234:1 288:11-289:7
123:24-125:12		126:20-131:10 140:8-144:17
144:18-145:25		146:1-16
146:17-161:25	Hearsay	
165:14-166:9		
169:23-172:25		173:1-2
175:15-22		
178:1-179:7		

Page: Lines	Objections	Counter-designations
181:8-183:1		183:2-184:7
184:12-187:18		187:19-24
190:8-25		190:17-22 193:22-195:18 196:22-198:10
199:4-200:24		200:25-203:1
203:8-209:18		209:19-212:24
215:18-218:6		215:7-18 287:15-288:6
232:1-233:9	Speculation	
236:24-238:7		283:17-240:21

*Deposition of Tony Makris, taken March 24, 2021*

Page: Lines	Objections	Counter-designations
93:1- 94:4	FRE 106 (92:1-25; 117:7-18)	92:1-25; 117:7-18
94:16-95:13	Relevance	92:1-25; 117:7-18
100:19-101:24	Relevance	97:11-23; 98:17-100:6; 102:1-25; 103:24-104: 16
105:12-106:22	Relevance	108:19-110:14; 112:25-113:5
110:18-112:14		112:25-113:5
113:19-115:19		112:25-113:5
119:24-120:12		118:10-119:23; 120:13-16
127:24-130:12		127:8-11



Page: Lines	Objections	Counter-designations
132:8-19		132:20-133:13
133:14-134:22		
151:4-156:13		150:6-151:3
165:1-15		164:20-25; 165:16-166:4
171:4-172:15		92:1-25; 117:7-18
176:24-178:18		
180:3-24		180:25-181:12
240:23-241:13		240:16-22
245:13-247:21	Relevance <i>Confidential (247:3-21)</i>	74:5-75:23
250:1-251:9	<i>Confidential (249:1-251:15)</i>	284:22-285:2
252:13-255:21	Document speaks for itself <i>Confidential (252:22-254:6)</i>	284:22-285:2
260:3-261:8	Relevance; Foundation; Speculation; Hearsay	
265:9-266:11	Foundation; Speculation	
266:24-269:9	Document speaks for itself; Argumentative, Leading, Form, Assumes facts not in evidence; mischaracterizes testimony (267:25-268:6)	
272:2-20	Lack of Foundation; Hearsay	

*Deposition of Gayle Stanford, taken March 25, 2021*

Page: Lines	Objections	Counter-designations
13:02-13:08		

<b>Page: Lines</b>	<b>Objections</b>	<b>Counter-designations</b>
13:25-14:08		
14:13-14:14		
14:15-14:15		
14:16-14:19		
14:21-14:22		
14:24-15:01		
15:03-15:03		
15:05-15:06		
15:07-15:25		
16:01-16:12		
16:13-16:15		
16:17-16:23		
16:25-17:02		
17:03-17:08		
17:17-17:20		
17:21-18:02		
18:03-19:02		
19:03-19:04		
20:07-20:09		
22:07-22:08		
22:09-22:15		22:16-17

Page: Lines	Objections	Counter-designations
23:07-23:14		
24:14-24:16		
24:17-25:04		
25:24-26:13		
26:14-27:08		
27:09-27:15		
28:03-28:09		
28:10-28:18		
28:19-28:25		
29:01-29:03		29:3-11
31:11-32:01		
32:02-32:19	Vague	
32:21-33:01	Vague	
33:03-33:04		
33:06-33:10	Vague	
33:12-33:16		
33:17-33:18		
33:19-34:03		
34:04-34:13		
34:15-34:23	Hearsay	
34:25-35:05		

Page: Lines	Objections	Counter-designations
36:01-36:03		
36:05-36:25		
37:12-37:14		
37:16-38:02		
40:08-41:02		
41:15-41:19		
41:20-41:25		
42:02-42:12		
42:13-42:14		
42:15-42:22		
42:25-43:12		
43:13-43:21		44:4-5
44:20-45:09		
45:23-46:01		
46:02-46:02		
46:06-46:13		
46:15-46:22	Speculation	
46:25-47:16		
47:19-48:01		
48:02-48:20		
48:22-49:03		

Page: Lines	Objections	Counter-designations
49:04-49:14		49:15-20
49:21-49:25	Vague	
50:02-50:15		
50:18-51:10		
51:25-52:03		
52:04-52:13		
52:20 -53:03		
53:08-53:22		
54:10-54:22		
55:14-56:07		
57:25-59:14		
60:18-60:23		
60:25-61:05		
61:06-61:10		
61:11-61:11		
61:13-61:21		
61:22-61:25		
62:24-63:14		
63:16-63:16		
65:18-65:20	Misstates testimony	
66:05-66:11		

Page: Lines	Objections	Counter-designations
66:17-66:23		
66:24-67:15		
67:16-67:22		
67:23-67:25	Calls for speculation	
68:03-68:07	Calls for speculation	
68:19-68:24		
75:21-76:08		
86:23-87:06		87:7-16
87:17-88:12		
88:13-88:16		
88:17-88:22		
88:24-89:01		
89:03-89:12		
91:09-91:17		
91:23-92:06		
92:07-93:15		
93:16-93:21		93:22-25
95:01-95:05		
95:07-95:15		
95:19-96:02		
96:07-96:18		

Page: Lines	Objections	Counter-designations
96:19-96:22		
96:23-96:25		
97:05-97:12		
97:14-97:14		
97:15-97:17		
97:18-98:02		
118:18-118:25		
119:01-119:02		
119:07-119:25		
120:01-120:09		
120:10-120:10		
120:12-120:21		
120:23-121:15		
122:01-122:16	Speculation (122:13-18)	
122:18-122:18	Speculation (122:13-18)	
122:19-123:07	Outside scope of direct	
123:09-124:05	Outside scope of direct	

*Deposition of William Winkler, 30(b)(6), taken March 26, 2021*

Page: Lines	Objections	Counter-designations
62:6-13		59:7-62:5 62:14-64:1
64:2-65:7	Speculation (64:10-12)	
65:8-20		

69:8-70:11	Hearsay testimony based on out-of-court statements of Angus McQueen (69:17-23)	66:10-69:7
70:12-72:25	Hearsay testimony based on out-of-court statements of Rick Tedrick (71:15-23 )  Hearsay testimony based on out-of-court statements of Angus McQueen (75:5-7)	
73:1-14	Hearsay testimony based on out-of-court statements of Angus McQueen	
74:16-75:24		
76:2-10		
84:18-85:22		
85:23-86:6		
101:20-104:13		104:14-105:19
108:5-109:15		107:10-108:4 109:16-110:3
110:4-22	Hearsay testimony based on out-of-court statements of Angus McQueen	
116:14-117:2		116:4-13
122:12-123:10	Hearsay testimony based on out-of-court statements of Angus McQueen (122:22-23 )	117:3-122:11
123:11-124:8	Speculation; Lacks foundation (123:6-9)	124:9-127:7
143:21-148:2	Hearsay testimony based on out-of-court statements of Angus McQueen (144:3-6)  Hearsay testimony based on out-of-court statements of Angus McQueen (144:13-148:2)	
151:12-21		151:22-152:19
152:20-154:14	Hearsay testimony based on out-of-court statements of Angus McQueen (152:22-153:1)  Hearsay testimony based on out-of-court statements of Angus McQueen (153:12-18)	



156:4-160:22	Hearsay testimony based on out-of-court statements of Angus McQueen (156:22-158:16)	
163:18-167:21	Hearsay testimony based on out-of-court statements of Angus McQueen (164:6-13)  Hearsay testimony based on out-of-court statements of Angus McQueen (164:19-21)	162:8-163-17
176:4-23		
179:17-180:14		180:21-181:9
181:10-183:11		183:12-183:19 184:19-21
184:22-185:18	Hearsay testimony based on various out-of-court statements told to him or in writing (185:7-18)	185:19-21
186:5-12		
198:21-199:13		199:14-200:2 203:13-205:16 207:9-208:7 208:23-209:22 210:14-211:10 213:13-23 214:22-215:4 215:5-216:19 218:22-219:13 219:14-17 219:23-220:5 222:10-24
230:2-231:9	Hearsay testimony based on out-of-court statements by various declarants verbally and in writing (230:19-231:9)	
233:15-235:8	Argumentative; speculation; lacks foundation; hearsay based on review of out-of-court statements by Montgomery	
236:2-237:3	Hearsay testimony based on out-of-court statements by Angus McQueen and review of out-of-court statements by Montgomery	
239:10-243:24	Speculation, lacks foundation (241:13-242:6); Relevance (242:1-6); Hearsay; no personal knowledge, lacks foundation (243:5-243:24)	238:18-239:9

244:3- 246:7	Hearsay ( <i>see</i> testimony at 254:3-8 (witness testifies he was not party to conversation about which he gave testimony); Argumentative, speculation, lacks foundation (245:13-17)	
--------------	--	--

*Deposition of Melanie Montgomery, taken March 31, 2021*

Page: Lines	Objections	Counter-designations
13:17-15:17		19:18-20:17; 30:22-33:12
20:19 -5		
26:14-27:12		
80:15-81:15		84:6-24; 85:21-86:25
82:21-83:19		
88:20-93:2		95:11-22; 96:1-97:5
112:10-115:14		115:15-117:9
117:10 -19		
117:20-119:10		

Dated: April 7, 2021

Respectfully submitted,

/s/ Gregory E. Garman

Patrick J. Neligan, Jr., SBN 14866000

Douglas J. Buncher, SBN 03342700

John D. Gaither, SBN 24055516

**NELIGAN, LLP**

325 North St. Paul, Suite 3600

Dallas, Texas 75201

Telephone: 214-840-5333

Facsimile: 214-840-5301

pneligan@dneliganlaw.com

dbuncher@neliganlaw.com

jgaither@neliganlaw.com

Gregory E. Garman

Nevada Bar No. 6654, admitted *pro hac vice*

William M. Noall

Nevada Bar No. 3549, admitted *pro hac vice*

Dylan Ciciliano

Nevada Bar No. 12348, admitted *pro hac vice*

**GARMAN TURNER GORDON LLP**

7251 Amigo Street, Suite 210

Las Vegas, Nevada 89119

T: 725-777-3000 / F: 725-777-3112

ggarman@gtg.legal

wnoall@gtg.legal

dciciliano@gtg.legal

*Counsel for Debtors*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all parties receiving notice by and through the Court's CM/ECF system on April 7, 2021.

/s/ Caitlin Halm

Caitlin Halm, an employee of  
Garman Turner Gordon LLP